

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:13-CR-00315-KMW

FREDERIC CILINS,

Defendant.

/

**DEFENDANT CILINS' UNOPPOSED AMENDED¹ MOTION TO BRING CELLULAR
TELEPHONE AND LAPTOP INTO COURTHOUSE FOR USE DURING HEARING**

Comes now, the Defendant, Frederic Cilins, by and through undersigned counsel, and hereby requests that this Honorable Court approve undersigned to bring a laptop and a cellular telephone into the courthouse for use during the hearing in this case June 20, 2013, and in support thereof states as follows:

1. Mr. Cilins is currently charged with Intimidation or Force Against Witness; Obstruction of Criminal Investigations; and Destruction, Alteration or Falsification of Records in Federal Investigations.
2. Mr. Cilins has a hearing on his motion to reduce bond scheduled for June 20, 2013, at 10:30 a.m. in front of Judge Kimba M. Wood.
3. Undersigned respectfully requests that his counsel be permitted to bring a laptop and cellular telephone into the courthouse for possible use during the hearing.

¹ Mr. Cilins amends his original motion only to include the Proposed Order for the Court's review.

4. Undersigned has conferred with Assistant United States Attorney Elisha Kobre. He does not oppose this motion or the relief requested herein.

WHEREFORE, Defendant, Frederic Cilins, respectfully requests that this Honorable Court approve the request to bring a laptop and cellular telephone into the courthouse.

Respectfully submitted,

/s/ Michelle P. Smith

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 14, 2013, undersigned electronically filed the foregoing *Defendant Cilins' Amended Motion to Bring Cellular Phone and Laptop into Courthouse for Use During Hearing* with the Clerk of Court (CM/ECF) by using the CM/ECF system which will send a notice of electronic filing and copy to the following: Elisha Kobre, Stephen Spiegelhalter, Bruce Lehr, and Sherleen Mendez.

/s/ Michelle P. Smith

Co-counsel for Frederic Cilins